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Counsel for Plaintiff Dominique Morrison on
behalf of herself and all others similarly situated

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DOMINIQUE MORRISON, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

ROSS STORES, INC.,

Defendant

Case No: 4:18-cv-02671-YGR

**DECLARATION OF STUART L.
COCHRAN IN SUPPORT OF MOTION
FOR ATTORNEYS' FEES AND
EXPENSES**

Date: **January 25, 2022**

Time: **2:00 PM**

Place: Courtroom 1, 4th Floor

Judge: Hon. Yvonne Gonzalez Rogers

Complaint Filed: May 7, 2018

1 I, Stuart L. Cochran, declare as follows:

2 1. I am a partner at the law firm of Steckler Wayne Cochran Cherry PLLC and class
3 counsel for the Plaintiff Class in the above-entitled action. I am submitting this declaration in
4 support of my firm's application for an award of attorneys' fees and costs in connection with services
5 rendered in the above-entitled action.

6 2. Steckler Wayne Cochran Cherry PLLC handles national cases that present cutting edge
7 issues and its attorneys have extensive trial and arbitration experience in a variety of cases, including
8 securities fraud and qui tam actions under the False Claims Act. The attorneys at SWCC understand
9 how to litigate difficult and large cases in an efficient and cost-effective manner, and they have used
10 these skills to obtain outstanding results for their clients. SWCC attorneys are recognized in their field
11 for excellence and integrity, and are committed to seeking justice for their clients. Its lawyers are
12 admitted in various state and federal jurisdictions across the United States, including in Texas, New
13 York, Pennsylvania, California, Louisiana, Missouri, Oklahoma, and Illinois. The firm's lawyers
14 collectively have more than a century of experience handling complex litigation. Steckler Wayne
15 Cochran Cherry PLLC's firm resume is attached as Exhibit 1, and the firm has been recognized by its
16 peers and Courts nationwide for its successful class-action leadership.

17 3. I am a member in good standing of the bar of the States of Texas and Missouri and I
18 have never been the subject of any type of disciplinary proceeding. I am admitted or have been
19 admitted *pro hac vice* to practice before the United States District Courts for the Northern, Eastern,
20 Southern, and Western Districts of Texas; United States District Courts for the Southern, and Northern
21 Districts of California; United States District Court for the Southern District of Illinois; United States
22 District Court for the Southern District of Ohio; United States District Court for the Eastern District
23 of Missouri, and the United States District Court for the Western District of Washington.

24 4. I have been admitted to the Bar of the State of Texas since 2000. I have focused my
25 practice on complex commercial, consumer, class, and catastrophic injury litigation—on both sides
26 of the bar, having represented publicly-traded corporations, privately-held businesses, and
27 individuals. I spent the first six years of his career in the trial section of one of the largest international
28

1 firms in the United States, where I gained experience in a wide variety of cases involving numerous
2 industries, including energy, commercial real estate, telecom, IT, aerospace, accounting/audit,
3 aviation, healthcare, logistics, insurance, commodities, and securities. I has represented clients in
4 federal, state, and arbitration proceedings across the nation, including Texas, Alabama, Georgia,
5 Arkansas, Missouri, Maryland, New York, Colorado, Washington, D.C., Florida, Illinois, California,
6 Ohio, Washington state, and Massachusetts.

7 5. I have been appointed lead counsel and co-lead counsel in numerous class actions.
8 Examples are: *Miloro v. Van's International Foods, Inc.*, No. 15PH-CV00642 (Circuit Court for
9 Phelps County, Missouri); *Tovar v. Drews LLC*, No. 16-L-313 (Circuit Court for St. Clair County,
10 Illinois); *Morrison and Collier v. Natural Chemistry, L.P.*, No. 16SL-CC01991 (Circuit Court of St.
11 Louis County, Missouri); • *Dugan v. Topco Associates LLC*, No. 16-L-446 (Circuit Court for St. Clair
12 County, Illinois); *Pryzbysz et. al. v. Kraft Heinz Foods Co.*, No. 17-L-0402 (Circuit Court for St. Clair
13 County, Illinois); *Barnes et. al. v. River North Foods, Inc.*, No. 16-L-459 (Circuit Court for St. Clair
14 County, Illinois); *Hansen-Mitchell et. al. v. Welspun USA, Inc., et. al.*, No. 19-L-0391 (Circuit Court
15 for St. Clair County, Illinois). My firm's resume is attached hereto as Exhibit 1.

16 6. The total number of hours spent on this litigation by my firm is 645. The total lodestar
17 amount for attorney/professional time based on my firm's usual and customary rates is \$475,000. See
18 Exhibit 2.

19 7. The figures and amounts reflected in the foregoing paragraph are derived from
20 contemporaneously kept time records that are inputted into a computerized billing system
21 maintained by my firm.

22 8. Based upon my experience with other class action matters, I believe that the time
23 expended by my firm in connection with this action is reasonable in amount and was necessarily
24 incurred in connection with the prosecution of this action.

25 9. My firm has incurred a total of \$4,128.65 in expenses in connection with the
26 prosecution of this litigation. See Exhibit 2.

10. The aforementioned expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from expense vouchers, check records, and other documents. The expense records summarized in this declaration and submitted herewith accurately reflect the expenses incurred by my firm in pursuit of this litigation.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 18, 2021, in the State of Texas.

Respectfully Submitted,

Dated: October 18, 2021

/s/Stuart L. Cochran
Stuart L. Cochran

ATTESTATION

I, the undersigned, am the ECF user whose identification and password are being used to file this document. I hereby attest and represent, in compliance with Civil L.R. 5-1(i)(3), that concurrence in the filing of the document(s) has been obtained from the signatories above.

/s/ Michael McShane